

ORIGINAL INTERVENTION



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BEFORE THE ARIZONA CORPORATION COMMISSION

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COMMISSIONERS

GARY PIERCE, Chairman
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AZ CORP COMMISSION
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Arizona Corporation Commission

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IN THE MATTER OF THE APPLICATION OF
TUCSON ELECTRIC POWER COMPANY FOR
APPROVAL OF ITS 2013 RENEWABLE
ENERGY STANDARD IMPLEMENTATION
PLAN AND DISTRIBUTED ENERGY
ADMINISTRATIVE PLAN AND REQUEST
FOR RESET OF ITS RENEWABLE ENERGY
ADJUSTOR

Docket No. E-01933A-12-0296

**APPLICATION OF
FREEPORT-MCMORAN
COPPER & GOLD INC.
AND ARIZONANS FOR
ELECTRIC CHOICE AND
COMPETITION FOR LEAVE
TO INTERVENE**

Pursuant to A.A.C. R14-3-105, Freeport-McMoRan Copper & Gold Inc. ("Freeport-McMoRan") and Arizonans for Electric Choice and Competition ("AECC") hereby apply to the Arizona Corporation Commission (the "Commission") for an Order granting Freeport-McMoRan and AECC leave to intervene in the above captioned proceeding.

Freeport-McMoRan maintains facilities and operations within the State of Arizona, which receive electric services from Tucson Electric Power Company ("TEP"). As a user of electric services provided by TEP, Freeport-McMoRan will be directly and substantially affected by the decision of the Commission in this proceeding. The Commission should, therefore, grant Freeport-McMoRan leave to intervene in this matter.

AECC is a coalition of energy consumers, most of whom are also customers of TEP. The Commission should grant AECC leave to intervene in this matter because the members of AECC are customers of TEP and will be directly and substantially affected by the decision of the Commission in this proceeding. The Commission should, therefore,

1 grant AECC leave to intervene in this matter.

2 Neither Freeport-McMoRan's nor AECC's participation in this proceeding will
3 broaden the issues nor unduly delay the proceeding, except upon leave of the Commission
4 first had and received.

5 For the reasons outlined above, Freeport-McMoRan and AECC respectfully
6 request that the Commission grant this Application for Leave to Intervene in this matter.

7 Freeport-McMoRan and AECC request that all communications in connection with
8 the above captioned proceeding be directed to:

9 C. Webb Crockett
10 Patrick J. Black
11 FENNEMORE CRAIG, P.C.
12 3003 North Central Avenue
13 Suite 2600
14 Phoenix, Arizona 85012-2913
(602) 916-5333
Fax: (602) 916-5533
wcrocket@fclaw.com
pblack@fclaw.com

15 Kevin C. Higgins, Principal
16 Energy Strategies, LLC
17 215 South State Street
Suite 200
Salt Lake City, Utah 84111
KHiggins@Energystrat.com

18
19 RESPECTFULLY SUBMITTED this 1st day of October 2012.

20 FENNEMORE CRAIG, P.C.

21 By 

22 C. Webb Crockett
23 Patrick J. Black
24 3003 N. Central Avenue, Ste. 2600
Phoenix, AZ 85012-2913

25 Attorneys for Freeport-McMoRan Copper & Gold Inc.
26 and Arizonans for Electric Choice and Competition

1 **ORIGINAL and 13 COPIES** of the foregoing
2 **FILED** this 1st day of October 2012 with:

3 Docket Control
4 ARIZONA CORPORATION COMMISSION
5 1200 West Washington
6 Phoenix, Arizona 85007

7 **COPY** of the foregoing was **HAND-DELIVERED/**
8 **MAILED** this 1st day of October 2012 to:

9 Lyn Farmer, Chief Administrative Law Judge
10 Hearing Division
11 Arizona Corporation Commission
12 1200 West Washington
13 Phoenix, Arizona 85007

14 Janice Alward, Chief Counsel
15 Legal Division
16 Arizona Corporation Commission
17 1200 West Washington Street
18 Phoenix, Arizona 85007

19 Steve M. Olea, Director
20 Utilities Division
21 Arizona Corporation Commission
22 1200 West Washington Street
23 Phoenix, Arizona 85007

24 Michael W. Patten
25 ROSHKA DEWULF & PATTEN
26 One Arizona Center
400 East Van Buren Street, Suite 800
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88 E. Broadway Blvd., MS HQE910
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